

Monday, May 24, 2021

Logan J. Hunt, CPL
Argent Mineral Management, LLC
500 E. Reynolds Drive
Ruston, Louisiana 71270

**Re: Louisiana Board of Ethics
Docket No. 2019-1218**

Dear Mr. Hunt:

The Louisiana Board of Ethics ("Board"), at its June 4, 2021 meeting, considered your request for an advisory opinion as to whether the Louisiana Code of Governmental Ethics ("Code") would prohibit you from continuing your employment with Argent Mineral Management, LLC ("AMM") after being elected to the Lincoln Parish Police Jury ("LPPJ").

FACTS PROVIDED

You were elected to be a police juror for District 5 of the LPPJ. Currently, the LPPJ contracts with Argent Advisors, Inc. ("AAI"), which is a subsidiary of Argent Financial Group, Inc. ("AFG") with four (4) directors/officers. AFG has sixteen (16) directors/officers, sharing only two (2) with AAI. AAI performs financial services for the LPPJ, managing approximately \$10,000,000.00 in assets, the majority of which are held in the LPPJ's "Hospital Proceeds Fund."

You stated that you are currently a salaried employee of AMM, which has one manager that is not AFG. AMM provides mineral management services, including the accounting and auditing of royalty payments. As a salaried employee of AMM, you own 180 shares of AFG stock out of the 1,282,000 outstanding shares (which is roughly .01%). You stated that you are not an officer, director, trustee, or partner of AFG or any of its subsidiaries. Additionally, you receive no compensation or compensation from AAI.

LAW

La. R.S. 42:1111(C)(2)(d) provides that no public servant and no legal entity in which the public servant exercises control or owns an interest in excess of twenty-five percent, shall receive any thing of economic value for or in consideration of services rendered, or to be rendered, to or for any person during his public service unless such services are: (d) Neither performed for nor compensated by any person or from any officer, director, agent, or

employee of such person, if such public servant knows or reasonably should know that such person has or is seeking to obtain contractual or other business or financial relationships with the public servant's agency; conducts operations or activities which are regulated by the public employee's agency; or has substantial economic interests which may be substantially affected by the performance or nonperformance of the public employee's official duty.

La. R.S. 42:1112(B)(3) provides that no public servant shall participate in a transaction involving the governmental entity in which, to his actual knowledge, any person of which he is an officer, director, trustee, partner, or employee has a substantial economic interest. La. R.S. 42:1120.4 allows the appointed board member to recuse herself from any discussion, debate, and vote on any matter which would violate Section 1112.

La. R.S. 42:1120.4 provides an exception for appointed members of a board or commission to recuse themselves from voting on matters that violate section 1112 of the Code. The appointed members may not discuss and debate the matter.

CONCLUSION

The Board concluded, and instructed me to inform you, that based on the facts presented, that the Code would prohibit you from continuing your employment with AMM while serving as a member of the LPPJ. La. R.S. 42:1111C(2)(d) would prohibit you from continuing your employment or continuing to serve as an LPPJ member should AMM seek to enter into any contract, transaction, or other business relationship with the LPPJ.

This advisory opinion is based solely on the facts as set forth herein. Changes to the facts as presented may result in a different application of the provisions of the Louisiana Code of Governmental Ethics. The Board issues no opinion as to past conduct or as to laws other than the Louisiana Code of Governmental Ethics, the Campaign Finance Disclosure Act, the Lobbyist Disclosure Act, and the conflict of interest provisions contained in the Louisiana Gaming Control Law. If you have any questions, please contact me at (800) 842-6630 or (225) 219-5600.

Sincerely,

LOUISIANA BOARD OF ETHICS

LaToya D. Jordan
For the Board